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SHERIFF'S OFFICE) and RICHARD EGAN

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

TIMOTHY MCDOWELL,

Plaintiff,

vs.

COUNTY OF LASSEN,

Defendant.

) Case No.: 2:23-cv-01007-DJC-DMC

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) **REVISED STIPULATION AND ORDER**

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) **TO MODIFY THE PRETRIAL**

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) **SCHEDULING ORDER TO EXTEND**

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) **DISCOVERY DEADLINES**

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1 THE PARTIES, by and through their respective counsel and subject to the approval of this
2 Court, hereby stipulate and respectfully request to modify the following deadlines set forth in this
3 Court's Pretrial Scheduling Order of May 31, 2024 (ECF. No. 31):

- 4 • That the Fact Discovery deadline currently set for April 4, 2025 be moved to July 31,
5 2025;
- 6 • That the Expert Witness Designation deadline currently set for May 2, 2025 be moved
7 to August 28, 2025;
- 8 • That the Supplemental Disclosure deadline currently set for May 30, 2025 be moved
9 to September 25, 2025;
- 10 • That the Expert Discovery deadline currently set for June 27, 2025 be moved to October
11 23, 2025;
- 12 • That the Dispositive Motion deadline currently set for September 5, 2025 be moved to
13 November 14, 2025.
- 14 • That the Hearing on Dispositive Motions currently set for October 30, 2025 at 1:30
15 p.m. be moved to January 8, 2026 at 1:30 p.m.
- 16 • That the Final Pre-trial Conference currently set for January 15, 2026 at 1:30 p.m. be
17 moved to April 23, 2026 at 1:30 p.m.;
- 18 • That the Trial set currently set for March 9, 2026 at 8:30 a.m. to be moved to June 15,
19 2026 at 8:30 a.m.

20 The parties stipulate to and request this modification of the Pretrial Scheduling Order as to
21 the discovery cut-off, expert witness disclosures, dispositive motion deadlines, final pre-trial
22 conference date, and trial date for the following reasons, which constitute good cause pursuant to
23 Section X of the Pretrial Scheduling order and FRCP 16(b):

- 24 • There have been no prior requests for extension by the Parties.
- 25 • Written discovery in this case has involved compiling comparative evidence related to
26 Plaintiff's disparate treatment theory, which has required additional time to evaluate
27 and respond to.
- 28 • Depositions have not yet occurred but are anticipated and will require preparation and

flexibility in scheduling.

- The current fact discovery deadline does not provide sufficient time to complete these tasks, given counsels' schedules.
- Other deadlines are being adjusted accordingly to align with the proposed fact discovery deadline extension.

IT IS SO STIPULATED.

Dated: March 13, 2025

ANGELO, KILDAY & KILDUFF, LLP

/s/ Jacob J. Graham

By: _____
SERENA M. WARNER
JACOB J. GRAHAM
Attorneys for Defendants COUNTY OF
LASSEN and RICHARD EGAN

Dated: March 13, 2025

ASBILL LAW GROUP, A PROFESSIONAL
LAW CORPORATION

/s/ Natalia Asbill-Bearor
(As Authorized on 3.12.25)

By: _____
NATALIA ASBILL-BEAROR
Attorneys for Plaintiff TIMOTHY
MCDOWELL

ORDER

IT IS HEREBY ORDERED:

- Fact Discovery deadline be moved to July 31, 2025;
- Expert Witness Disclosure deadline be moved to August 28, 2025;
- Supplemental Expert Witness Disclosure deadline be moved to September 25, 2025
- That Expert Discovery Cutoff be moved to October 23, 2025;
- Deadline to file Dispositive Motions be moved to November 14, 2025;
- Hearing date for Dispositive Motions be moved to January 8, 2026 at 1:30 p.m.;
- Final Pretrial Conference be moved to April 23, 2026 at 1:30 p.m.;
- Jury Trial be moved to June 15, 2026 at 8:30 a.m.

IT IS SO ORDERED.

Dated: March 13, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE